

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

SARIAH MOODY,)	
GRACE READING,)	
And)	
EMILY CADY)	
)	Case No. 4:20-CV-526
Plaintiffs,)	
)	
v.)	
)	
)	
CITY OF KANSAS CITY, MISSOURI,)	
)	
Defendant.)	

MOTION TO EXCEED PAGE LIMITS

For good cause shown, the City of Kansas City, Missouri (“City”) hereto respectfully requests the Court to allow it to exceed the page limits in filing the City’s Opposing Suggestions to Plaintiff’s Motion for Preliminary Injunction. In support of this motion, City states:

1. This is an action brought to test the facial and as applied constitutional validity on overbreadth and vagueness grounds for two City ordinances.
2. The City has drafted its Opposing Suggestions to Plaintiff’s Motion for Preliminary Injunction in accordance with the Local Rule 7.0, which sets a 15-page limit on opposing suggestions. However, due to having three plaintiffs, two separate ordinances that have been attacked on several constitutional grounds, and numerous authorities, the City was unable to adequately address the issues to be presented to this Court within the requisite 15 pages. The City’s motion is 20 pages in length, excluding cover, table of contents, authorities, and statements of fact.

3. The City needs the additional pages to educate the Court, adequately address the numerous arguments issues pertaining to the substantive claims averred by Plaintiffs, and affirmative defenses as raised by the City.

WHEREFORE, based on the foregoing, the City respectfully request that this Court allow it to exceed the page limitations set forth by Local Rule 7.0 in filing its Opposing Suggestions to Plaintiff's Motion for Preliminary Injunction.

Respectfully submitted,

OFFICE OF THE CITY ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of July, 2020, a copy of the foregoing was sent to all counsel of record via ECF.

/s/ Tara M. Kelly
Tara M. Kelly